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5 Attorney for Plaintiff
MELANIE PAIGE CARLSON

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 MELANIE PAIGE CARLSON,
12 Plaintiff,
13 v.
14 KILOLO KIJAKAZI,
15 ACTING COMMISSIONER OF
16 SOCIAL SECURITY,
Defendant.

No. 1:23-CV-00451 (BAM)

**STIPULATION FOR BRIEFING
EXTENSION; [PROPOSED] ORDER**

24 On March 24, 2023, Plaintiff Melanie Paige Carlson filed the instant civil action for
25 judicial review of the defendant Commissioner of Social Security's decision denying her
26 application for Social Security disability benefits. (ECF Doc. 1) The Defendant responded to
27 Plaintiff's Complaint on May 30, 2023. (ECF Doc. 11) Pursuant to the Court's Scheduling Order,
28 the parties stipulated to a first-time 30-day extension of time for Plaintiff to file her motion for

1 summary judgment. (ECF Doc.12) Plaintiff's motion for summary judgment is currently due to
2 be filed on or before July 30, 2023. (ECF Doc. 11 and 12)

3 Plaintiff now requests a second extension of sixty (60) days to file her motion. (ECF Doc.
4 5 at p.3:17-18) Plaintiff's counsel seeks the briefing extension due to unexpected travel and
5 assistance to an elderly parent. A sixty (60) day extension is sought due to the uncertainty of the
6 circumstances prompting the request and to minimize conflicts with existing filing deadlines
7 before this Court. Plaintiff's counsel apologizes to the Court for any inconvenience caused by the
8 extension request. The defendant has no objection to the requested extension.

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Respectfully submitted,

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Dated: July 26, 2023

NEWEL LAW

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By: Melissa Newel

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Melissa Newel

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Attorney for Plaintiff

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MELANIE PAIGE CARLSON

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Dated: July 26, 2023

PHILLIP A. TALBERT

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United States Attorney

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MATTHEW W. PILE

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Associate General Counsel

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Office of Program Litigation, Office 7

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By: Justin L. Martin

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JUSTIN L. MARTIN

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Special Assistant United States Attorney

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Attorney for Defendant

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1 **ORDER**

2 Good cause having been shown, IT IS ORDERED that Plaintiff shall be granted an
3 extension of time of sixty (60) days to file her motion for summary judgment. The motion for
4 summary judgment shall be filed on or before September 28, 2023. All other deadlines in the
5 Court's Scheduling Order are modified accordingly.
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8 IT IS SO ORDERED.

9 Dated: July 27, 2023

10 /s/ *Barbara A. McAuliffe*
11 UNITED STATES MAGISTRATE JUDGE

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